

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

In Re:	:	
	:	Case No. 15-15969-elf
Elaine Jones	:	
	:	Chapter 13
Debtor	:	
	:	

**CERTIFICATION OF DEFAULT**

AND NOW, comes U.S. Bank Trust National Association, as Trustee of the Chalet Series III Trust (hereafter "Movant"), by and through their attorneys, Tucker Arensberg, P.C., and files this Certification of Default stating as follows:

1. Movant is the holder of a claim secured by real property known as 1733 Georges Lane, Philadelphia, PA 19131.

2. JPMorgan Chase Bank, National Association ("Chase") filed a Motion for Relief from Stay as a result of Debtor's failure to make payments when due under both the terms of the Note with Movant and under the terms of her proposed Chapter 13 Plan.

3. Subsequent thereto, Chase and the Debtor did enter into a Stipulation resolving the Motion for Relief from Stay.

4. The Stipulation was approved by this Honorable Court on February 6, 2016.

5. On November 21, 2017, Chase assigned its claim and all rights to received payments under the Stipulation to MTGLQ Investors, LP.

5. On August 6, 2018, MTGLQ Investors, LP assigned its claim and all rights to received payments under the Stipulation to Movant.

6. The Debtor has failed to make payments as required under the Stipulation. Specifically, the Debtor has failed to make the contractual payments from September 1, 2017 through November 1, 2018, payments for a total delinquency for \$13,347.15.

7. On September 21, 2018, Counsel for Movant sent a Notice of Default (the "Notice-1") via Certified Mail, First Class Mail and email to counsel for the Debtor advising that the required payments had not been paid and giving the Debtor ten days to cure the default. A copy of the Notice-1 is attached hereto as Exhibit A.

8. On October 9, 2018, Counsel for Movant sent a Second Notice of Default (the "Notice-2" and together with Notice-1, collectively the "Notices") via Certified Mail, First Class Mail and email to counsel for the Debtor advising that the required payments had not been paid and giving the Debtor ten days to cure the default. A copy of the Notice-2 is attached hereto as Exhibit B.

9. Despite the Notices, the default has not been cured.

WHEREFORE, U.S. Bank Trust National Association, as Trustee of the Chalet Series III Trust requests this Honorable Court to enter an Order terminating the stay as to the Real Property.

Respectfully submitted,

TUCKER ARENSBERG, P.C.

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